

# Privacy Policy

## 1. Introduction

Safe Steps provides specialist support services for anyone in Victoria who is experiencing or afraid of domestic or family violence. We collect, use, disclose and handle personal information for the purpose of providing these services.

We are committed to protecting the privacy and security of personal and health information we collect. We are required to comply with the *Privacy Act 1988 (Cth)*, *Privacy and Data Protection Act 2014 (Vic)*, *Health Records Act 2001 (Vic)*, *Family Violence Protection Act 2008 (Vic)*, *Child Wellbeing and Safety Act 2005* and other relevant laws.

This Privacy Policy describes how we collect, hold, use and disclose personal information and should be read together with our website [Disclaimer](#).

By accessing the Safe Steps website or otherwise providing personal information to us, you (ie individual or authorised organisation) indicate your acceptance of this Privacy Policy, which may be amended from time to time.

## 2. Dealing with Safe Steps anonymously or pseudonymously

Safe Steps is committed to maintaining your privacy and we will only use your personal and sensitive information for a permitted purpose for which we have collected the information. There is no obligation for you to provide us with any of your personal information however if you choose not to provide us with your personal information, we may not be able to provide you with the services that you require.

You have the option of not identifying yourself or using a pseudonym when dealing with us in relation to a particular matter, unless we believe it is impracticable to do so in the circumstances.

## 3. Why do we collect, hold, use and disclose personal information?

We collect, hold, use and disclose personal information for the following purposes:

- to provide services to you and respond to enquiries;
- to contact you about our events, programs, campaigns or activities;
- for marketing and research purposes of Safe Steps, its contractors or service providers;

- to understand how you interact with us by recording information about you in a Customer Relationship Management system (for example, that you are a volunteer and a donor if that is the case);
- to process donations made to us and may acknowledge the donation on our website or other public forum, unless you choose to make a private or anonymous donation;
- to audit and manage our website;
- for internal administration purposes;
- to process applications to work with us as an employee, contractor, student or volunteer;
- to meet legal and other regulatory obligations imposed on us (for example, sharing risk information under the Multi-Agency Risk Assessment and Management Framework in accordance with the *Family Violence Protection Act 2008 (Vic)*);
- to update our records and to keep your contact details up to date;
- to process and respond to any complaints made by you; and
- to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a court, regulator or other government authority.

We will only collect information that is necessary and relevant to the scope and administration of services we provide and will collect sensitive information, wherever practicable and possible, with your consent or as otherwise permitted under relevant legislation.

## 4. What personal information do we collect?

The personal information we collect about you depends on the nature of your interaction(s) with us.

### If you are seeking support, we may collect:

- Contact details such as:
  - your name, preferred name or pronouns;
  - date of birth;
  - phone number, postal or email address;
  - your preferred method of contact (such as texting before calling) and noting the time it may be safe to make contact.
- Your communication needs including interpreters or other communication aids.
- Support person, advocate, next of kin or emergency contact details and the relationship of that person to you.

- Information about your:
  - family members;
  - health;
  - cultural identity and diversity;
  - current housing status;
  - income;
  - details and any relevant information around the circumstances of the person using violence;
  - family violence risks, protective factors, risks and needs of your children or young people coming into or in our service; and
  - support needs.
- Information to inform a safety plan.
- Information about the crimes perpetrated against you.
- Information about Child Protection involvement.

**Please note:** information about sexual orientation, gender identity or intersex status is confidential and you will be consulted on how and why your personal information is recorded, stored and shared

**If you donate to us, we may collect:**

- Contact details such as:
  - your name, preferred name or pronouns;
  - date of birth;
  - phone number, postal or email address.
- Your relationship to other donors including corporate and individual.
- Payment details (but only to process your payment – we do not store your credit card details).
- Previous donation history or the amount you have donated.

**If you are seeking to work with us as a volunteer, employee, student or contractor, we may collect:**

- Contact details such as:
  - your name, preferred name or pronoun;
  - date of birth;
  - phone number, home and postal address, and email address.
- Professional details (e.g., previous employer or business name, job title/occupation, previous employment information).
- Medical history (e.g., any allergies or other conditions that help us ensure you are safe

at work).

- Financial information (e.g., Tax File Number, bank details and superannuation details).

#### **If you are a visitor to our website, we may collect:**

- Information about the computer equipment and the version of the operating system you are using.
- Device type and screen size.
- How long you stay on a page.
- Browsing path information.
- Exit page information.
- The settings of the device you use to visit our website.

*See Section 10. Safe Steps Website below for further details*

## **5. How do we collect your personal information?**

We collect personal information in various ways including if you:

- contact us for support via phone, email or online chat;
- register for face to face or digital events (such as webinars);
- donate to us or donate gift cards or contact us about making a bequest in your will;
- hold a fundraising event;
- participate in public or closed surveys, questionnaires or conference events;
- apply to work with us either as an employee, contractor or volunteer;
- work for an organisation that partners with us (for example, referral agencies or legal representatives); or
- interact with us online including via our website or social media networks (such as Facebook, Twitter, YouTube, Instagram or LinkedIn) – the social network providers will also handle your personal information for their own purposes and have their own privacy policies.

## **6. Who do we disclose your personal information to?**

We will only use or disclose your personal information in accordance with our Privacy Policy, unless you have consented to the additional use or disclosure, or where:

- disclosure is necessary to prevent injury to life or health;
- to investigate any suspected unlawful activity; or

- where the use or disclosure is required or authorised by or under an Australian law or a court/tribunal order (including by an enforcement body) – for example, disclosures required under the *Family Violence Protection Act 2008 (Vic)*.

We will **never** sell your personal information to other parties.

In addition, your personal information may be provided to third parties where services relating to the purpose for which the personal information is collected are outsourced. For example, we may disclose your personal information to our:

- third-party service providers and contractors in connection with the services we provide to you (for example, police, ambulance, Local Family Violence Service, IT service providers and marketing service providers); and
- professional advisors (for example, accountants, payroll, salary packaging, auditors and lawyers).

In these situations, we take reasonable steps to require our third-party service providers and contractors to manage personal information securely and in line with privacy legislation.

We only disclose sensitive or health information for the purposes for which you gave it to us or for a directly related purpose you would reasonably expect or agree to.

Safe Steps and our third-party service providers may transfer, process and store your personal information outside of Australia, including in the United States. When we transfer your information outside of Australia, we take steps to protect it.

## 7. Accessing and correcting your personal information

You may request access to your personal information collected by us and ask that we correct that personal information, for example, if your name has changed.

You can ask for access to personal information held by us by emailing the Privacy Officer at [privacyofficer@safesteps.org.au](mailto:privacyofficer@safesteps.org.au). A [Request for Information Form](#) and copies of Certified Identification are required to access personal information.

We will usually respond within 30 days. If we refuse to give you access to, or correct your personal information, we will notify you in writing setting out the reasons.

## 8. Information about another person

Advocates, legal representatives, service providers and others may wish to access or share information about another person.

Unless compliant with the Family Violence Information Sharing Scheme, any request to access or share information about another person must be requested in writing by emailing the Privacy Officer at [privacyofficer@safesteps.org.au](mailto:privacyofficer@safesteps.org.au). A [Request for Information Form](#), including relevant supporting documents and/or written consent to act on behalf of another person is required to access personal information.

We will usually respond within 30 days. If we refuse to give access to, or correct personal information about another person, we will notify you in writing setting out the reasons.

## 9. Security

We may hold your information in hard copy or electronic form.

We take reasonable steps to ensure the security of all information we collect, including that the information is protected from misuse and loss and from unauthorised access, modification or disclosure. For example, your electronic personal information is maintained in a secure environment, which can be accessed only by authorised personnel.

In addition, we take reasonable steps to destroy or de-identify your personal information once we no longer need it or have been directly instructed by you to permanently remove or suppress your personal information. We follow the Public Record Officer Victoria's Retention and Disposal Authorities for minimum document retention requirements.

## 10. Safe Steps Website

Safe Steps does not collect personal information when individuals simply browse the Safe Steps website.

When an individual accesses the Safe Steps website, a non-identifying record is made of the visit and Safe Steps logs the following information for statistical data collection purposes that informs service development and the improvement of user experience:

- The individual's server address

- The individual's top-level domain name (e.g. .com, .org, au)
- The pages the individual accessed, and documents downloaded
- The previous site the individual visited
- The type of browser being used (e.g. Google Chrome, Explorer)
- Device type and screen size
- Geographic information (country only)
- Preferred language

Safe Steps does not identify users or their browsing activities except, in the event of an investigation, where a law enforcement agency may exercise a warrant to inspect server logs.

## Cookies

Cookies are pieces of information that a website transfers to your computer's hard disk for record keeping purposes. The cookies simply operate as a unique identifier, which help Safe Steps to know what its website users find interesting and useful. Data collected from the website use does not identify the user, allowing them to remain anonymous.

Most web browsers are set to accept cookies however, individuals who do not wish to receive any cookies may set their browser to refuse them. In some instances, this will mean that they will not be able to take full advantage of parts of the website that provides them with improved service.

When an individual closes their browser the session cookie set by Safe Steps website is destroyed and no personal information is maintained which might identify an individual should they visit the website at a later date.

## Google Analytics

Our website uses Google Analytics, a product provided by Google, to help us understand traffic and usage in order to help improve our services, programs, content and resources.

Google Analytics does not identify individual users or associate your device's Internet Protocol address (IP address) with any other data held by Google.

By using our website, you consent to the processing of information about you by Google in the manner described in Google's Privacy Policy and for the purposes set out above. You can opt out of Google Analytics if you disable or refuse the Google cookie, disable JavaScript, or use the opt-out service provided by Google.

## 11. Notifiable Data Breaches Scheme

In the event of any unauthorised access, unauthorised disclosure or loss of your personal information that is likely to result in serious harm to you, we will investigate and notify you and the Office of the Australian Information Commissioner in accordance with the Privacy Act.

## 12. Complaints about your privacy

If you believe your privacy has been breached or if you have a complaint about how we have handled your personal information, please contact us in writing the Privacy Officer at [privacyofficer@safesteps.org.au](mailto:privacyofficer@safesteps.org.au). We will respond within a reasonable period (usually within 30 days from lodgement).

If you are not satisfied with our response, you may lodge a formal complaint with the Office of the Australian Information Commissioner [oaic.gov.au](http://oaic.gov.au).

## 13. Children Under the Age of 16

Safe Steps is a Child Safe organisation and child safety is at the forefront of service delivery and way of working. All employees, students and volunteers have an obligation to ensure we keep children safe from harm and abuse. We understand the importance of protecting the privacy of children, especially in an online environment, which is why our website is not designed for or directed at children under 16.

## 14. Changes to this Policy

This Policy may change from time to time. Any updated versions of this Policy will be posted on our website and will be effective from the date of posting.

This Policy was last approved by the Board on 5 August 2024.

## 15. Who are we?

In this Privacy Policy, references to “Safe Steps”, “we”, “our” or “us” are references to Safe Steps Family Violence Response Centre Inc (ABN 86 138 521 643).

## 16. How to contact us

**Email:** [privacyofficer@safesteps.org.au](mailto:privacyofficer@safesteps.org.au)

If you, or someone you know, is experiencing family violence call Safe Steps 24/7 on **1800 015 188**

GPO Box 4396, Melbourne VIC 3001 | ACN 690 057 320 | 03 9928 9600 | [safesteps.org.au](http://safesteps.org.au)